





In re: Jeffrey Denton v. Columbia Oldsmobile, Inc.  
Charge No. 221A00544

**AFFIDAVIT OF JEFFERY WATTS**

STATE OF OHIO :  
: SS:  
COUNTY OF HAMILTON :

Now comes Jeffery Watts, and after being duly cautioned and sworn states as follows:

1. I am Jeffery Watts and a mechanic with Columbia Oldsmobile, Inc.
2. I have been a mechanic for Columbia Oldsmobile for eight years.
3. I know Jeffrey Denton as a former employee of Columbia Oldsmobile. I believe that Jeffrey Denton was employed with Columbia Oldsmobile from the spring of 1999 through the fall of 2000.
4. On or about February 22, 2000, I along with a co-employee, Mark Frye, decided to pull a prank on Jeffrey Denton.
5. The prank involved connecting a hose from one of the automobiles which recently had repair work involving upper cylinder head cleaning which produces an odor and a bunch of fumes along with carbon monoxide to the break room.
6. The purpose of the prank was to cause a bad smell to filter through the break room to surprise Jeffrey Denton. There was never any thought that there was anything hazardous associated with the prank.

7. Mark Frye and I never consulted with anyone else including other employees, managers, or other representatives of Columbia Oldsmobile about our prank.

8. The prank was done on our own without any consent, permission or ratification by anyone from Columbia Oldsmobile, Inc. After we performed the prank, I am aware that Jeffrey Denton claimed that he became sick.

9. Several days after the prank when it came to the attention of management at Columbia Oldsmobile, Inc. I was contacted by Karl Stewart, the general manager, and reprimanded for my actions.

10. A meeting was held with all concerned and I along with Mark Frye were advised that our actions were improper and would not be tolerated again.

11. I along with Mark Frye was suspended without pay for three days because of the incident.

12. I apologized to Jeffrey Denton because of the incident, shook his hand and Jeffrey Denton accepted the apology.

**FURTHER AFFIANT SAYETH NAUGHT.**

  
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**JEFFREY WATTS**

Sworn to and subscribed to before me, a Notary Public, in and for said County and State, this 31<sup>ST</sup> day of JULY, 2001.

  
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**NOTARY PUBLIC**

JEFFREY WATTS, Attorney at Law  
10000 Highway 100, Suite 100  
Lynchburg, Virginia 24502  
My Notary Public has no expiration  
date. Section 147.03 O.R.C.